

# ROCKY FLATS ENVIRONMENTAL TECHNOLOGY SITE REGULATORY CONTACT RECORD

**Date/Time:** February 1, 2001/1600

**Site Contact(s):** Jeff Stevens and Dyan Foss  
**Phone:** 5797 and 7577

**Regulatory Contact:** Steve Tarlton  
**Phone:** 303-692-3423

**Agency:** CDPHE

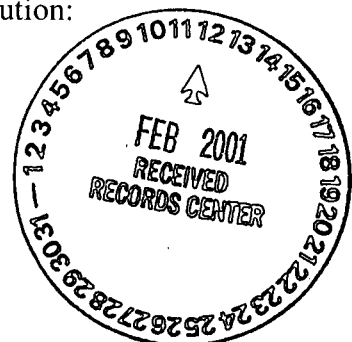
**Purpose of Contact:** Discussed final modification and issues associated with the RSOP for Component Removal, Decontamination and Size Reduction Activities

**Discussion:** Discussed the attached outline to obtain agreement from CDPHE of the final minor changes to the RSOP. *Steve agreed with the proposed changes to the RSOP, and agreed that CDPHE will work on the outstanding issues for potential future modifications to the RSOP.*

**Contact Record Prepared By:** Dyan Foss *[Signature]* 2/1/01

**Required Distribution:**  
Administrative Record

**Additional Distribution:**



Contact Record 4/10/00  
Rev. 10/11/00

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## **RSOP for Component Removal, Size Reduction, and Decontamination Activities changes made since the 1/24/01 meeting with CDPHE**

- Made numerous editorial changes (punctuation, word-smithing, acronyms, definitions, and updates based on changes to K-H Programs and organizational changes)
- Made some changes to Figures 1 and 2, attached
- Changed the Unrestricted Release Table PCB language, attached
- Changed the time to review the notification letter to 30 days for letters that include RCRA unit closure information and 14 days for letters that do not contain RCRA unit information (Discussed with James on 1/30 and he said no problem)
- Added the following section, which was review by James approved 1/30:

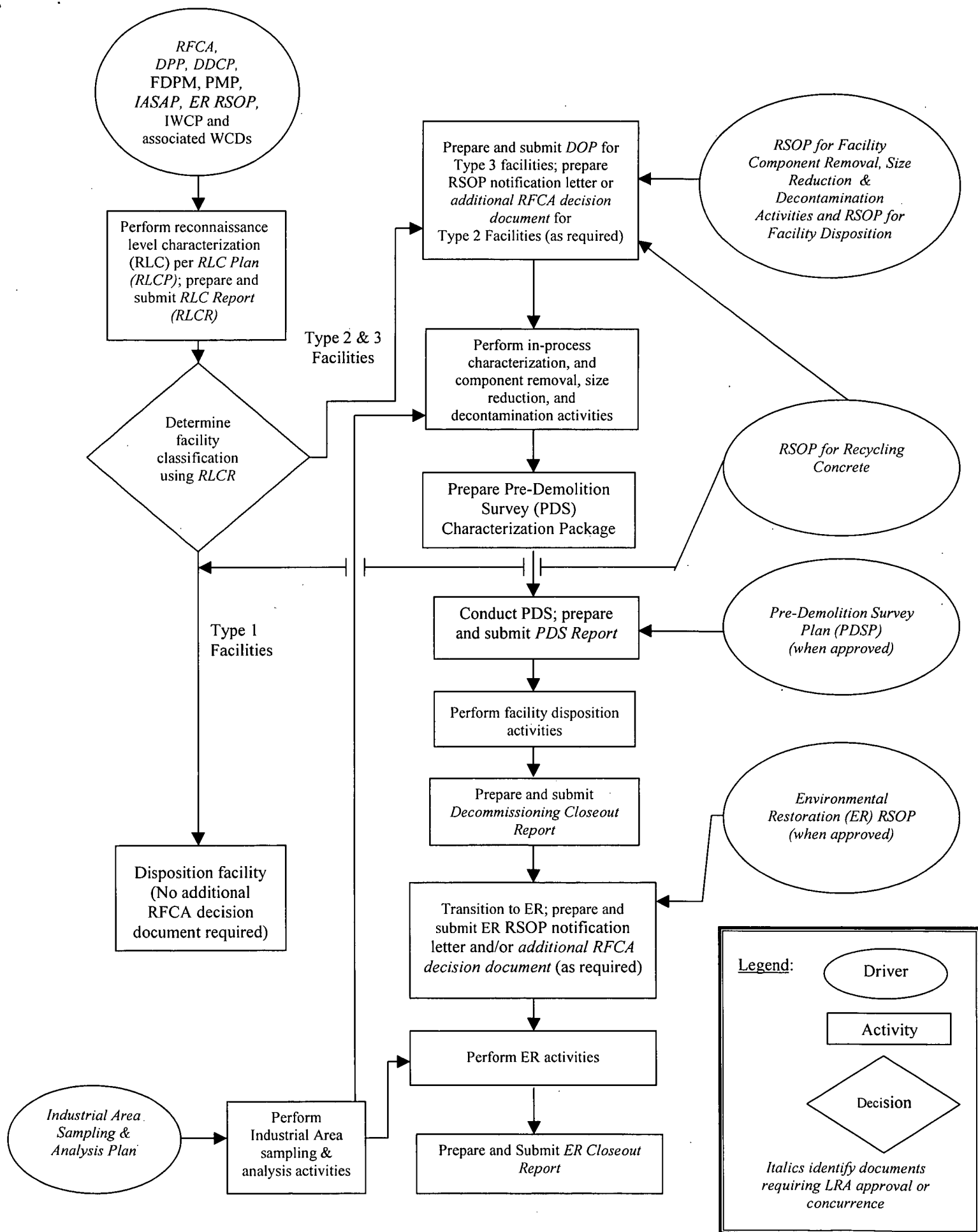
### **3.3.1.3      *Drum Crushing and Compaction***

Drum crushing/compaction will be established at the 750 Pad, Tent 5. Additional drum crushing may be initiated elsewhere onsite provided notice is given to CDPHE at least seven (7) days in advance; and, provided that the notification includes pertinent information, including: type of unit; length of time the unit will be in operation; volume to be managed; physical and chemical characteristics of the waste to be managed; potential for release; hydrogeological and any other environmental conditions that may influence the migration of any potential release; potential for exposure to humans and the environmental receptors if a release occurs; unit specific information sheet; and the required inspection frequency.

Drum crushing activities will be conducted in a "Permacon" contamination containment enclosure within Tent 5 on the 750 Pad. The unit, expected to operate through 2006, will crush low level and non-radioactively contaminated drums originating from various locations onsite. A few hundred non-contaminated and low level lead-lined drums are expected to be crushed. Drum crushing activities will be conducted in accordance with an approved procedure. The procedure requires that lead-lined drums must be empty prior to crushing. Drum crushing activities are not planned for beryllium contaminated drums. In the event crushing of lead-lined beryllium contaminated drums is necessary, the Job Hazards Analysis (JHA) and procedure will be revised accordingly. Crushed lead-lined drums will be managed as LLM remediation waste.

The drum crusher is a self-contained unit designed to mitigate airborne releases. Lead trained workers will be utilizing the appropriate personal protective equipment/clothing as dictated in the Job Hazards Analysis (JHA). A unit specific information sheet will be posted on the entrance of the area containing the unit. The unit will be inspected daily during lead-lined drum crushing operations and weekly when remediation waste is located in the area.

- Outstanding issues for discussion (potential modification prior to approval or minor modifications in the near future)
  - Process versus remediation waste management
  - Hazard reduction and miscellaneous equipment removal activities (specifically South Sides)
  - ARARs section will need modification based on current negotiations with the state and changes in the regulations
  - Terminating Mixed Residue Consent Orders via the RSOP



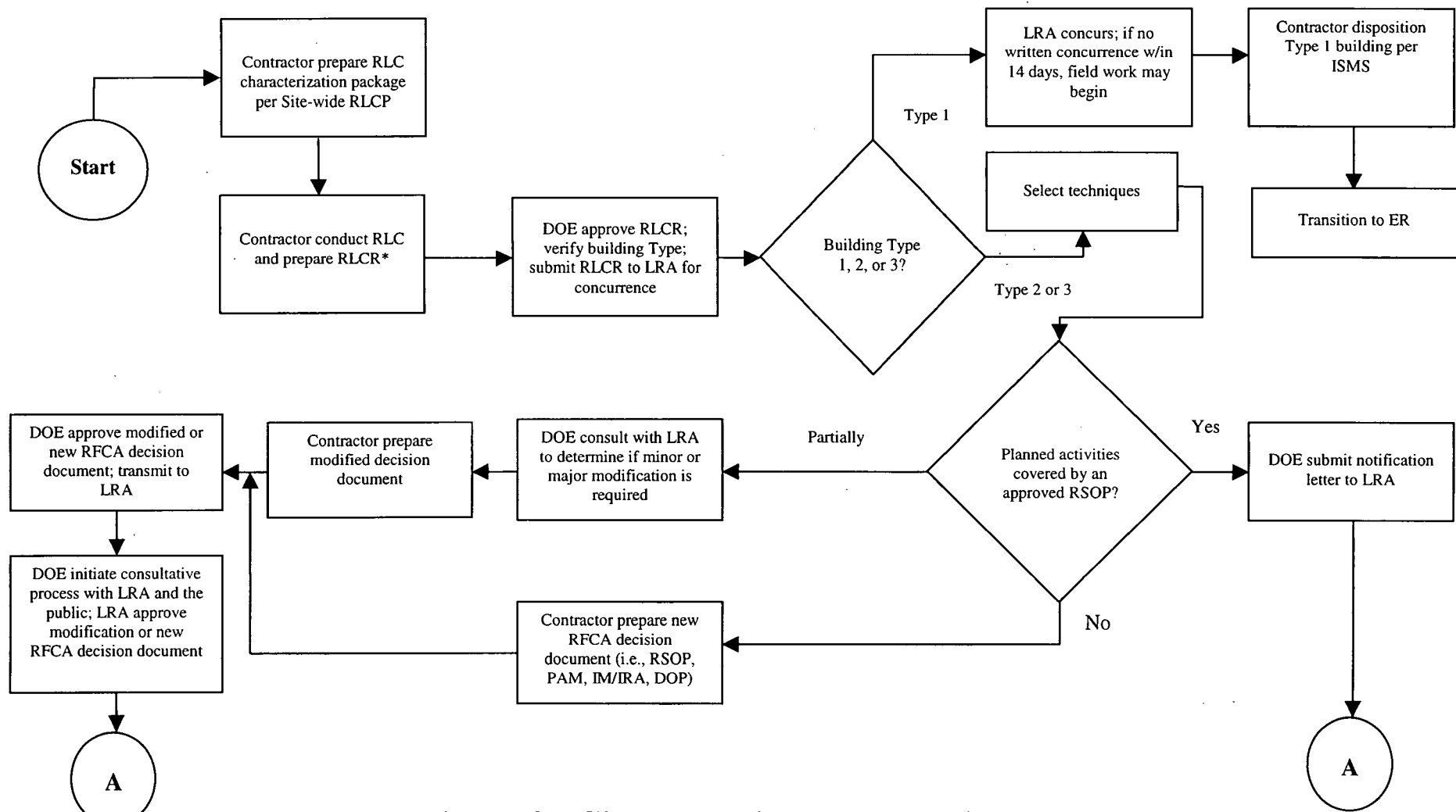


Figure 2. Closure Project Process Flow

\*As provided in the Decommissioning Program Plan, it may be possible to perform certain activities prior to conducting the reconnaissance level characterization; the characterization performed during work planning development may be adequate to perform specific work as determined in consultation with the LRA.

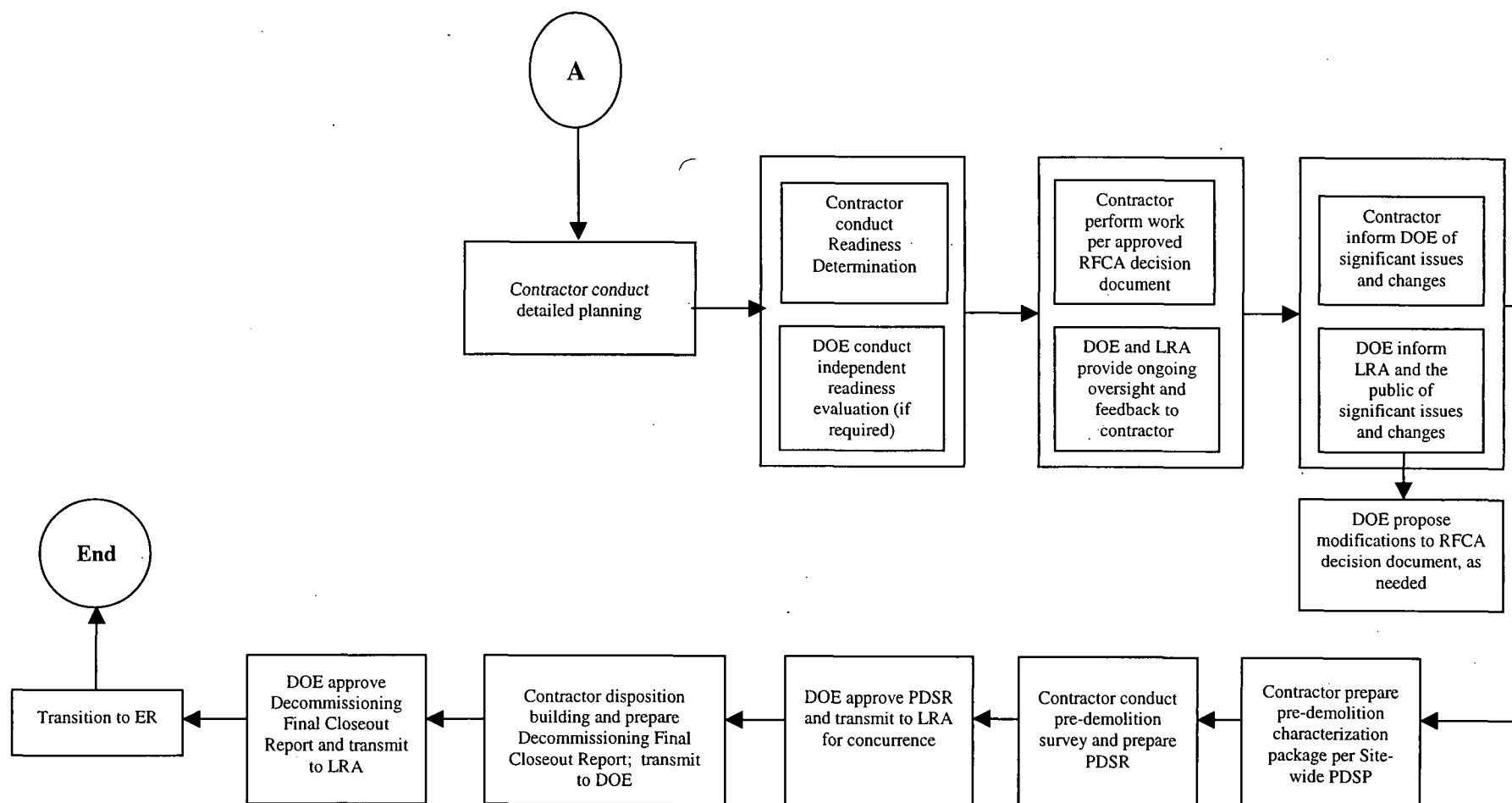


Figure 2. Closure Project Process Flow (continued)

Table 2. Unrestricted Release Criteria

Contaminant	Requirement Source	Unrestricted Release Threshold		
		Total Average (dpm/100 cm <sup>2</sup> )	Total Maximum (dpm/100 cm <sup>2</sup> )	Removable (dpm/100 cm <sup>2</sup> )
<b>Radionuclides<sup>a</sup></b>				
Transuranics	DOE Order 5400.5, Figure IV-1	100	300	20
Th-Natural		1,000	3,000	200
U-Natural		5,000	15,000	1,000
Beta-Gamma emitters	DOE "No-Radioactivity Added" Waste Verification Program	5,000	15,000	1,000
Tritium		N/A	N/A	10,000
<b>Hazardous Waste</b>	6 CCR 1007-3, Parts 261 through 268	No listed hazardous waste or characteristic hazardous waste is present		
<b>Beryllium</b>	10 CFR 850.31	The removable contamination level for equipment and other items released from beryllium work areas to the general public or for use in DOE non- beryllium areas is set at 0.2 µg/100 cm <sup>2</sup> . <sup>b</sup>		
	10 CFR 850.31, as interpreted by a DOE letter dated January 4, 2001	The unrestricted release limit for building materials is also set at 0.2 µg/100 cm <sup>2</sup> .		
<b>Polychlorinated Biphenyls (PCBs)</b>	40 CFR 761	The release level for PCBs will be determined for each project by assessment of the requirements of 40 CFR 761		
<b>Asbestos Containing Material (ACM)</b>	40 CFR 763 5 CCR-1001-10	No sample in a sample set representing a homogeneous medium results in a positive detection (i.e., > 1% by volume)		

<sup>a</sup> The unrestricted release criteria for radionuclides are taken from "Application of Surface Contamination Guidelines for DOE Order 5400.5," DOE, April 23, 1998.

<sup>b</sup> 10 CFR 850.31 imposes restrictions on the release of equipment and other items from beryllium work areas.

### 3.1 Overview of the Removal, Size Reduction, and Decontamination Process

Typically, component removal, size reduction, and decontamination activities will proceed in the following sequence, although many of the activities may overlap. As activities are planned and executed, the RFCA consultative process (see Section 8.2) will be used to provide opportunities for discussion and exchanges of information with the regulators and the public.

- 1) Information collected during the RLC will be evaluated to determine the sampling and survey activities required to prepare the necessary work authorization documents, such as RWPs required by the RFETS Radiological Control Program, the Self-Audit Checklist and Beryllium Work Form required by the CBDPP, JHAs required by the

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